

# advocates for justice chartered attorneys

225 Broadway, Suite 1902  
New York, New York 10007

t. (212) 285-1400  
f. (212) 285-1410

[www.afjlaw.com](http://www.afjlaw.com)

Hon. Philip M. Halpern  
United States District Court  
300 Quarropas Street  
White Plains, New York 10601

Application granted. The pre-motion conference scheduled for March 28, 2023 is adjourned to April 4, 2023 at 3:30 p.m. to be held in Courtroom 520 of the White Plains courthouse. The February 28th deadline for Plaintiffs to file opposition in compliance with the Court's Individual Practices remains in place.

SO ORDERED.

  
Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
February 27, 2023

Re: Gioia v Project Veritas 22-cv-06710  
Request to Adjourn Pre-Motion Conference

Dear Judge Halpern:

The Court has set a Pre-Motion Conference for March 28, 2023, in person, at noon. I have an employee discharge arbitration set for 11am that date. The employee has been out of work for over six-months, and rescheduling the arbitration could cause another 2-3 month delay.

We request that the conference be reset for April 4 or 5 2023. (I have a one-day trial in Los Angeles on March 30 and the 6<sup>th</sup> I will be traveling to be with family for Passover.

Thank you for your consideration.

Respectfully submitted,

*/s/ Arthur Z. Schwartz*

Arthur Z. Schwartz

cc: Justin Kelton, Esq. (by ECF)

**Arthur Z. Schwartz**  
Principal Attorney  
[aschwartz@afjlaw.com](mailto:aschwartz@afjlaw.com)